

JUN 29 2006

## NORTH COAST ACTION

P.O. Box 446 Fort Bragg, CA 95437 ph; 707-964-7085

<input checked="" type="checkbox"/> AEO	<input type="checkbox"/> WMgmt	<input type="checkbox"/> Admin
<input type="checkbox"/> AED	<input type="checkbox"/> Timber	<input type="checkbox"/> Legal
<input type="checkbox"/> Reg/NPS	<input type="checkbox"/> Cleanups	<input type="checkbox"/> Date

Catherine Kuhlman

Executive Officer of the North Coast Regional Water Quality Control Board

5550 Skylane Blvd. Suite A

Santa Rosa, CA 95403

June 20, 2006

Dear Ms. Kuhlman,

We are writing to you today regarding the letter entitled California Water Code Section 13267(b) ORDER addressed to Ms. Julie Raming on June 13, 2006.

After reviewing the Order, there are references to water quality and protection of the environment in the findings 8, 9, and 11, however there are ***no references to the protection of human health, public safety, and ecological health.***

The reported offsite dumping of ash generated at the mill site and used as soil amendment is of great concern to us and we feel it represents serious human health risks that need to be addressed. In our opinion, this goes beyond water quality especially since dioxins are virtually insoluble in water and tend to remain in soils and are bioaccumulative. We are also concerned about the other potential hazardous elements which are often present in fly ash from mill sites such as heavy metals. In the Order, in point 4 of testing it requires investigation at the McGuire Ranch Site to evaluate potential dioxins but not other potentially hazardous elements.

In addition, we noticed that none of the resource trustees [e.g., NOAA, US Fish and Wildlife, Cal Fish and Game] were cc'd on the order and by law, they should be noticed. This is contrary to your resource trustee responsibilities designated by Cal/EPA.

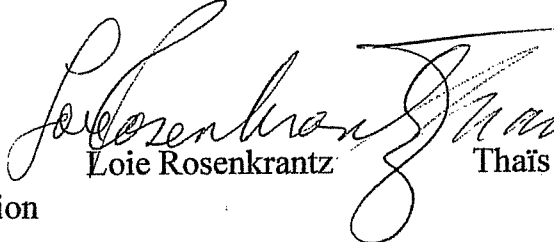
We look forward to hearing from you in the near future. You can reach us by phone at: 707-964-7085 or 707-964-3094.

Sincerely,



David Russell

for North Coast Action



Loie Rosenkrantz



Thais Mazur

cc: Dorothy Rice, Department of Toxic Substances Control  
 William Massey, North Coast Regional Water Quality Control Board  
 Jim Baskin, California Coastal Commission